



ROCHESTER-GENESEE REGIONAL TRANSPORTATION AUTHORITY

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October 10, 2011

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: LightSquared Technical Working Group Report; IB Docket No. 11-109

Dear Ms. Dortch:

I am writing on behalf of the Rochester Genesee Regional Transportation Authority (RGRTA) to express our concern regarding the January 2011 decision by the Federal Communication Commission's International Bureau granting a waiver to LightSquared to operate a nationwide 4G LTE network. RGRTA is the public transit provider serving seven counties in Western and Central New York. Since our transit system relies heavily on GPS, we would suffer significant harm if LightSquared's broadband system interferes with our GPS signals.

The construction of LightSquared's high-powered 4G-LTE network in the spectrum band immediately adjacent to the band used by the Global Positioning System (GPS) has been shown to cause severe interference with GPS. GPS has become a nationwide utility across various transportation modes and for other applications.

Interference with GPS signals would negatively impact our transit agency's ability to:

- *efficiently monitor the location of our fleet for operational, safety and security purposes;
- *efficiently schedule our buses;
- *operate our Automated Transit Information System technology, which notifies customers of the time at which their bus will arrive;
- *operate the automatic stop annunciation system, which is vital to our ability to make sure that the disabled community (i.e., the visually impaired) are informed of when the bus reaches their stop;
- *operate our network systems, which depend on the time derived from GPS information;
- *track where our supervisory personnel and on-road service vehicles are located in order to deploy them efficiently to where they are needed and respond to emergencies and threats;

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*utilize our video surveillance systems, both on campus and on vehicle, which would directly and adversely impact safety, security and first response.

Although LightSquared has suggested modifications to its original network deployment plan, it is our understanding that its new proposal will still cause unacceptable interference with many types of GPS receivers.

To ensure we protect our nation's vital GPS network, the Commission should preclude LightSquared from proceeding with the build out of its network until such time as LightSquared can demonstrate that its proposed network will not interfere with any class of GPS receivers, including those in current use, or planned future GPS receivers. Thank you for your consideration.

Sincerely,



William Carpenter
Chief Executive Officer

cc: Senator Charles Schumer
Senator Kirsten Gillibrand
Representative Louise Slaughter
Representative Kathy Hochul
Representative Ann Marie Buerkle
Representative Tom Reed